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Attorneys for Defendants
 WAL-MART STORES, INC. AND
 WAL-MART.COM USA LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE ONLINE DVD RENTAL ANTITRUST LITIGATION	Master File No. 4:09-md-2029 PJH MDL No. 2029 Hon. Phyllis J. Hamilton
This document relates to: ALL ACTIONS	STIPULATION AND [Proposed] ORDER REGARDING EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' ADMINISTRATIVE MOTION TO SEAL DOCUMENTS

WHEREAS Plaintiffs filed an Administrative Motion to Seal Documents Pursuant to Civil Local Rules 7-11 and 79-5(d) ("Administrative Motion") (Doc. No. 427);

WHEREAS Plaintiffs filed the Administrative Motion in connection with their (1) Opposition to Defendant Netflix's Motion for Summary Judgment (Doc. No. 430), (2) Memorandum In Opposition to Defendant Netflix's Motion to Exclude the Testimony of Gregory

1 T. Gundlach (Doc. No. 431), (3) Memorandum In Opposition to Defendant Netflix's Motion to
2 Exclude the Testimony of Dr. John Beyer (Doc. No. 428), and the (4) Declaration of Matthew W.
3 Ruan In Support of Plaintiffs' Memorandum in Opposition to Defendant Netflix's Motion for
4 Summary Judgment, Plaintiffs' Memorandum In Opposition to Defendant Netflix's Motion to
5 Exclude the Testimony of Dr. John Beyer and Plaintiffs' Memorandum in Opposition to
6 Defendant Netflix's Motion to Exclude the Testimony of Gregory L. Gundlach (Doc. No. 429);

7 WHEREAS the Administrative Motion requires Defendants Wal-Mart Stores, Inc. and
8 Wal-Mart.com USA LLC ("the Wal-Mart Defendants") to evaluate 56 exhibits containing
9 material which was designated as "Confidential" or "Highly Confidential" under the Protective
10 Order in this case;

11 WHEREAS Civil Local Rule 79-5(d) requires that the Wal-Mart Defendants respond to
12 Plaintiffs' Administrative Motion by June 24, 2011;

13 WHEREAS the Wal-Mart Defendants and Plaintiffs are meeting and conferring so that
14 the Wal-Mart Defendants may give consent to file publicly as many of the above-referenced
15 documents as possible;

16 WHEREAS the Wal-Mart Defendants anticipate that the majority of the above-referenced
17 documents may be filed publicly, but they continue to investigate whether good cause or
18 compelling reasons exist to support filing a minority of the exhibits under seal and whether
19 redacted exhibits may be offered in substitution and filed publicly;

20 WHEREAS the Wal-Mart Defendants' deadline for responding to the Administrative
21 Motion has not been previously extended; and

22 WHEREAS the parties do not expect this extension of time to affect the schedule for the
23 case, as the hearing date for Netflix's Motion for Summary Judgment, Motion to Exclude the
24 Testimony of Gregory T. Gundlach, and Motion to Exclude the Testimony of Dr. John Beyer is
25 currently set for August 31, 2011.

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1 The undersigned do hereby agree and stipulate that upon the entry of this [Proposed]
2 Order:

3 1. The time for the Wal-Mart Defendants to respond to Plaintiffs' Administrative
4 Motion is extended by 7 days, to July 1, 2011.

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6 Dated: June 23, 2011

Respectfully submitted,

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8 By: /s/ Paula W. Render
Paula W. Render (*Pro Hac Vice*)

9
10 Counsel for Defendants
WAL-MART STORES, INC. AND
11 WAL-MART.COM USA LLC

12
13 By: /s/ Matthew W. Ruan (with permission)
Matthew W. Ruan

14 MEMBER OF THE STEERING
15 COMMITTEE FOR PLAINTIFFS IN
16 MDL No. 2029

17
18 By: /s/ Dylan J. Liddiard (with permission)
Dylan J. Liddiard

19 Counsel for Defendant
20 NETFLIX, INC.

21
22 **IT IS SO ORDERED.**

23
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25 Dated: 6/24/11

26 By: 
27 Hon. Judge Phyllis J. Hamilton
28 United States District Judge

